

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>05-044</u>
v.	:	DATE FILED: <u>1-26-05</u>
WILLIAM SOSA,	:	VIOLATIONS:
a/k/a "King Homicide,"	:	18 U.S.C. § 1962(d) (conspiracy to
JONATHAN SANTANA,	:	participate in a racketeering enterprise -
a/k/a "King Terror,"	:	1 count)
AARON MARTINEZ,	:	18 U.S.C. § 1959(a)(1) (kidnaping in aid
a/k/a "King Life,"	:	of racketeering activity - 3 counts)
EDWIN IRIZARRY,	:	18 U.S.C. § 1959(a)(5) (conspiracy to
a/k/a "King Penguin,"	:	commit murder in aid of racketeering
MICHAEL J. GARCIA, Jr.,	:	activity - 10 counts)
a/k/a "King Tiger,"	:	18 U.S.C. § 1959(a)(5) (conspiracy to
JOSEPH WALLENBERG,	:	commit kidnaping in aid of racketeering
a/k/a "King Smiley,"	:	activity - 2 counts)
ALEX MELENDEZ,	:	18 U.S.C. § 1959(a)(6) (conspiracy to
a/k/a "King A.M.,"	:	maim in aid of racketeering activity -
ANGEL AVILES,	:	2 counts)
a/k/a "Len Vando,"	:	18 U.S.C. § 1951(a) (conspiracy to commit
a/k/a "King Cano,"	:	robbery and thereby affect commerce -
CLEMENT GARCIA,	:	1 count)
a/k/a "King K.R.,"	:	21 U.S.C. § 846 (conspiracy to distribute
ELVIS ORTIZ,	:	1000 grams or more of heroin within 1000
a/k/a "King Elvis,"	:	feet of a school - 1 count)
RAY MELENDEZ,	:	18 U.S.C. § 924(c) (use and carrying of a
a/k/a "King Silence,"	:	firearm during and in relation to a crime
ROBERTO ROSADO,	:	of violence - 6 counts)
a/k/a "King Fester,"	:	18 U.S.C. § 2 (aiding and abetting)
ANGEL SERRANO,	:	Notice of forfeiture
a/k/a "King Pleasure,"	:	
LEYDA REY-GONZALEZ,	:	
a/k/a "Queen Heart,"	:	
a/k/a "China,"	:	
OSCAR BERMUDEZ,	:	
a/k/a "King Fat Joe,"	:	
ROCELEEN RESTO,	:	
a/k/a "Queen Legend,"	:	
REYES SANCHEZ,	:	<u>UNDER SEAL</u>
a/k/a "King Rey"	:	

INDICTMENT

COUNT ONE

**CONSPIRACY TO PARTICIPATE IN A RACKETEERING (RICO) ENTERPRISE
18 U.S.C. § 1962(d)**

THE GRAND JURY CHARGES THAT:

THE RACKETEERING CONSPIRACY

1. From a time at least as early as in or about March 1999, to on or about January 26, 2005, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
JONATHAN SANTANA,
a/k/a “King Terror,”
AARON MARTINEZ,
a/k/a “King Life,”
EDWIN IRIZARRY,
a/k/a “King Penguin,”
JOSEPH WALLENBERG,
a/k/a “King Smiley,”
ALEX MELENDEZ,
a/k/a “King A.M.,”
ANGEL AVILES,
a/k/a “King Cano,”
ELVIS ORTIZ,
a/k/a “King Elvis,”
RAY MELENDEZ,
a/k/a “King Silence,”
ROBERTO ROSADO,
a/k/a “King Fester,”
ANGEL SERRANO,
a/k/a “King Pleasure,”
LEYDA REY-GONZALEZ,
a/k/a “Queen Heart,”
a/k/a “China,”**

**OSCAR BERMUDEZ,
a/k/a “King Fat Joe,”
ROCELEEN RESTO,
a/k/a “Queen Legend,” and
REYES SANCHEZ,
a/k/a “King Rey,”**

being persons employed by and associated with an enterprise known as the Philadelphia Lion Tribe, as more fully described in paragraphs 2 through 15 of this count, which enterprise was engaged in, and the activities of which affected, interstate commerce, conspired and agreed, with each other, and with others known and unknown to the grand jury, to violate Title 18, United States Code, Section 1962(c), that is, to knowingly and unlawfully conduct and participate, directly and indirectly, in the conduct of the affairs of such enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which consisted of multiple acts involving:

a. murder, which is indictable under Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502, 306, and 903, of the laws of the Commonwealth of Pennsylvania, which are punishable by imprisonment for more than one year, and which is defined as the intentional killing of a human being, which killing was willful, deliberate and premeditated, the knowing aiding and abetting, and willful causing of that murder with the intent to promote or facilitate, aid or attempt to aid, and solicit another to commit the intentional killing, and the agreement to commit the intentional killing;

b. kidnaping, which is indictable under Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2901, of the laws of the Commonwealth of Pennsylvania, which is punishable by imprisonment for more than one year, and which is defined

as unlawfully removing another a substantial distance, or unlawfully confining another for a substantial period, with the intent to either facilitate the commission of any felony, or to inflict bodily injury on, or to terrorize the victim, or another;

c. the receiving, concealing, selling, and otherwise dealing in controlled substances; namely, conspiracy to distribute and to possess with intent to distribute a controlled substance, that is, 1000 grams or more of a mixture and substance containing a detectable amount of heroin, which is indictable under Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846; and

d. the interference with commerce by threats and violence; namely, conspiracy to commit robbery and thereby obstruct and affect commerce and the movement of articles in commerce, which is indictable under Title 18, United States Code, Section 1951(a).

THE RACKETEERING ENTERPRISE

At all times material to this indictment:

2. The “Philadelphia Lion Tribe,” including its leadership, members, and associates, constituted an enterprise, as that term is defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise consisted of members of the local Philadelphia chapter of the ALKQN, and those state and national officers who directly and indirectly supervised, managed, and influenced those local members. This enterprise was engaged in, and its activities affected, interstate commerce, and functioned as follows:

3. The defendants participated in the operation of the enterprise as set forth in paragraphs 1 through 17.

4. The “Almighty Latin King and Queen Nation” (ALKQN) was a national organization, headquartered in Chicago, Illinois, with state offices and local chapters throughout the United States. Local chapters reported to state offices which, in turn, reported to the national “Motherland” office of the ALKQN in Chicago, Illinois.

5. The ALKQN had officers for its state and local chapters, who created and enforced the rules of the ALKQN. Local chapter officers included: “1st Crown,” known as “Inca” (the leader); “2nd Crown,” known as “Cacique”; “3rd Crown,” known as the “Chief Enforcer and Warlord”; “4th Crown,” which acted as “Treasurer”; “5th Crown,” which acted as “Secretary;” “Head of Security,” also known as “Pearl,” which functioned as a bodyguard for the “Inca”; and “Crown Council Chairman,” which functioned as a “judge” at ALKQN “judicial proceedings.” State officers included “Inca,” (leader) and “Regional Officer.” National “motherland” officers in Chicago included “regional officers,” who supervised the state offices and local chapters.

6. The ALKQN recruited male members, known as “Latin Kings” and female members, known as “Latin Queens,” examined prospective members, required the memorization of rules and “prayers,” and demanded of its members exclusive loyalty and absolute submission to the ALKQN and its leadership, as a condition of membership.

7. The ALKQN required its members to attend regular meetings, and to pay dues at these meetings, in order to fund the ALKQN by means of the legal and illegal activities of its members.

8. The ALKQN falsely held itself out to the public as a law-abiding, benevolent social group, and promoted this image through community parades, an internet web site, and other forms of false advertising and propaganda.

9. The ALKQN was an organization dedicated to committing drug trafficking offenses and violent crimes, including murder, attempted murder, kidnaping, robbery, rape, the use and carrying of firearms during and in relation to violent crimes and drug trafficking crimes, and assault and battery.

10. The Philadelphia Lion Tribe was the Philadelphia chapter of the ALKQN, and included those who exercised direct and indirect supervision of its members, and the Pennsylvania state office was also based in Philadelphia, Pennsylvania.

PURPOSES OF THE ENTERPRISE

11. It was a purpose of the enterprise that its members and associates would obtain money and property for the enterprise by the payment of dues, and by committing criminal acts, including those acts listed in paragraph 1 of this Count, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere.

12. It was a further purpose of the enterprise that its members and associates would maintain, protect and attempt to expand the power, territory and profits of the enterprise through the use of intimidation and violence.

13. It was a further purpose of the enterprise that, to ensure obedience to the leadership of the enterprise, and to the ALKQN, its members and associates would keep the enterprise's own members and associates, and the victims of their crimes, in fear of the enterprise and in fear of its members and associates through threats and acts of violence.

MANNER AND MEANS OF THE ENTERPRISE

14.____The manner and means used by the enterprise to further its goals and achieve its purposes included the following:

(a) Members of the enterprise learned and agreed to be bound by the rules and code of conduct of the enterprise, and of the ALKQN, and would enforce discipline among members who broke any of these rules.

(b) The enforcement of rules and the administration of discipline to any member who violated rules was achieved by bringing formal charges, convening tribunals and hearings, and executing punishment on violators.

(c) Punishments for violations of rules included physical beatings, torture, dismemberment, stabbing, shooting, burning, and murder. The “Incas” of the Philadelphia Lion Tribe and of the Pennsylvania office, ordered beatings by issuing “Beat-down On Sight” (BOS) orders, and ordered murders by issuing “Terminate On Sight” (TOS) orders.

(d) Members wore black and gold clothing and paraphernalia commonly associated with the ALKQN, obtained tattoos bearing the name Latin Kings, bore and used the symbol of a crown, and communicated with phrases, slogans, and hand signals associated with the ALKQN.

(e) Members created and used aliases and false identities, including “king” names for each member, in an attempt to obstruct justice, to mask the identities of criminal violators, and to otherwise further the goals of the enterprise.

(f) Members held regular meetings, at which they discussed past events, planned future activities, and collected dues from members of the enterprise, which dues were to

be paid to the state chapter, and, in turn, to the national headquarters of the ALKQN, and were otherwise used to further the criminal activities of the Philadelphia Lion Tribe.

(g) Members recruited other persons to become members of the Philadelphia Lion Tribe, and of the ALKQN.

(h) Members obtained, possessed, used, and carried firearms, during and in relation to the commission of crimes that benefitted the Philadelphia Lion Tribe.

(i) Members distributed, sold, and possessed with intent to distribute controlled substances, primarily heroin, but also cocaine and marijuana, and did so within 1000 feet of a public elementary school in Philadelphia, with the permission, and under the supervision, of the Philadelphia Lion Tribe, the proceeds of which were used directly and indirectly to benefit the Philadelphia Lion Tribe.

(j) Members committed and conspired, attempted, and threatened to commit, acts of violence against other Latin Kings and Queens, rival gang members, and others to protect and expand the Philadelphia Lion Tribe's territory, scope of criminal operations, and revenue.

THE DEFENDANTS AND THEIR ROLES IN THE ENTERPRISE

15. The defendants participated in the operation and management of the enterprise as follows:

(a) Defendant WILLIAM SOSA, a/k/a "King Homicide," was the Pennsylvania state leader, that is, "Inca," of the ALKQN, and exercised direct authority over all Latin Kings in Pennsylvania, including the Philadelphia Lion Tribe. He participated in murder, conspiracies to commit murders, attempted murders, kidnappings, conspiracies to commit kidnappings, beatings, conspiracy to distribute heroin, and carrying firearms during violent crimes.

He ordered contract murders by issuing “Terminate On Sight” (TOS) orders, and ordered beatings by issuing “Beat-down On Sight” (BOS) orders.

(b) Defendant JONATHAN SANTANA, a/k/a “King Terror,” participated in conspiracies to commit murder, kidnaping, conspiracies to commit kidnapings, beatings, and carrying firearms during violent crimes, and at various times during the period of the indictment held the positions of 1st Crown (Inca), 2nd Crown (Cacique), and 5th Crown (Secretary) of the Philadelphia Lion Tribe. Defendant SANTANA ordered an armed assault on New Jersey Latin Kings.

(c) Defendant AARON MARTINEZ, a/k/a “King Life,” participated in conspiracies to commit murders, attempted murder, kidnaping, conspiracy to commit kidnaping, beatings, and carrying firearms during violent crimes, and at one time during the period of the indictment held the position of 3rd Crown (“Warlord”) of the Philadelphia Lion Tribe.

(d) Defendant EDWIN IRIZARRY, a/k/a “King Penguin,” participated in murder, attempted murder, conspiracies to commit murders, and carrying firearms during violent crimes, and at one time during the period of the indictment held the position of Head of Security of the Philadelphia Lion Tribe, functioning as the bodyguard (“Pearl”) for defendant SOSA.

(e) Defendant JOSEPH WALLENBERG, a/k/a “King Smiley,” participated in the formation and formal recognition of the Philadelphia Lion Tribe, in conspiracies to commit murders, and in carrying a firearm during a violent crime, and held the position of overseer and direct supervisor of the Pennsylvania office, and of the Philadelphia Lion Tribe.

(f) Defendant ALEX MELENDEZ, a/k/a “King A.M.,” participated in conspiracy to commit murder, attempted murder, kidnapings, conspiracy to commit kidnapings,

beatings, and carrying firearms during violent crimes, conspiracy to distribute heroin, and was a soldier in the Philadelphia Lion Tribe.

(g) Defendant ANGEL AVILES, a/k/a “King Cano,” participated in murder, conspiracies to commit murders, and carrying a firearm during a violent crime, and at one time held the position of Regional Officer in the Philadelphia Lion Tribe.

(h) Defendant ELVIS ORTIZ, a/k/a “King Elvis,” participated in conspiracy to commit murder, kidnaping, conspiracy to commit kidnaping, beatings, carrying firearms during violent crimes, and conspiracy to distribute heroin, and at one time during the period of the indictment held the position of Head of Security and “Pearl” for defendant SOSA, in the state office.

(i) Defendant RAY MELENDEZ, a/k/a “King Silence,” participated in conspiracy to commit murder, kidnaping, beatings, and carrying a firearm during a violent crime, conspiracy to distribute heroin, and at one time during the period of the indictment held the position of 4th Crown of the Philadelphia Lion Tribe.

(j) Defendant ROBERTO ROSADO, a/k/a “King Fester,” participated in conspiracies to commit murders, kidnaping, conspiracy to commit kidnaping, beatings, and carrying a firearm during violent crimes, and was a soldier in the Philadelphia Lion Tribe.

(k) Defendant ANGEL SERRANO, a/k/a “King Pleasure,” participated in conspiracy to commit murder, kidnaping, beatings, and rape, and at various times during the period of the indictment held the positions of 1st Crown, 2nd Crown and 4th Crown of the Philadelphia Lion Tribe; and 2nd Crown and 3rd Crown of the state office.

(l) Defendant LEYDA REY-GONZALEZ, a/k/a “Queen Heart,” a/k/a “China,” participated in conspiracy to commit kidnaping, and held the position of First Crown (“Inca”) of the Latin Queens, within the Philadelphia Lion Tribe.

(m) Defendant OSCAR BERMUDEZ, a/k/a “King Fat Joe,” participated in conspiracy to commit kidnaping, beatings, and conspiracy to distribute heroin, and at various times during the period of the indictment held the positions of 4th Crown and 5th Crown of the Philadelphia Lion Tribe.

(n) Defendant ROCELEEN RESTO, a/k/a “Queen Legend,” participated in kidnaping, conspiracy to commit kidnaping, and beatings, and at various times during the period of the indictment held the positions of 1st Crown and 3rd Crown (“Chief Enforcer and Warlord”) of the Philadelphia Lion Tribe; and 3rd Crown and 4th Crown of the state office.

(o) Defendant REYES SANCHEZ, a/k/a “King Rey,” participated in conspiracies to commit murders, conspiracies to commit kidnaping, and carrying a firearm during a violent crime, and at one time during the period of the indictment held the position of 2nd Crown of the Philadelphia Lion Tribe.

THE AGREEMENT

16. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the enterprise’s affairs.

OVERT ACTS

17. In furtherance of the conspiracy, and to effect the objects and purposes thereof, the defendants, and others not named as defendants, committed various overt acts, including but not limited to the following:

(1) In or about March 1999, JOSEPH WALLENBERG, a/k/a “Smiley,” on behalf of the national “Motherland” ALKQN office, officially blessed and sanctioned the creation of the Philadelphia Lion Tribe chapter of the ALKQN.

(2) In or about March 1999, FNU LNU, a/k/a “King Savage,” and JOSEPH WALLENBERG, a/k/a “King Smiley,” on behalf of the national “Motherland” ALKQN office, officially blessed and appointed WILLIAM SOSA, a/k/a “King Homicide,” as the “Inca” of the Pennsylvania office of the ALKQN, with supervision of the Philadelphia Lion Tribe.

(3) Sometime in the Summer of 2002, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered the murder of a person known to the grand jury as “Snoopy,” in retaliation for attempting to start a new “Bloodlines” chapter of the ALKQN in Philadelphia, which action would be a threat to the Philadelphia Lion Tribe.

(4) Sometime in the Summer of 2002, in Philadelphia, a person known to the grand jury as LK-2, and other known and unknown Latin Kings severely beat “Snoopy,” causing him to flee Philadelphia, and to discontinue his plans to start a new ALKQN chapter.

(5) On or about October 5, 2002, in Chicago, Illinois, FNU LNU, a/k/a “King Savage,” formally appointed JOSEPH WALLENBERG, a/k/a “King Smiley,” as Regional Officer, with supervision of the Philadelphia Lion Tribe and all ALKQN activities in Philadelphia, Pennsylvania.

(6) In or about August 2003, the Philadelphia Lion Tribe took over, and otherwise assumed control of, the distribution of all heroin at the corner of Hope and Cambria Streets, in Philadelphia.

(7) In or about August 2003, WILLIAM SOSA, a/k/a “King Homicide,” ordered that he receive one-tenth of all revenues from heroin sold by, or under the supervision of, all members of the Philadelphia Lion Tribe.

(8) On or about September 8, 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered the murder of a Trenton, New Jersey male known to the grand jury.

(9) On or about September 8, 2003, WILLIAM SOSA, a/k/a “King Homicide,” JOSEPH WALLENBERG, a/k/a “Smiley,” and two other Latin Kings known to the grand jury traveled from Philadelphia to Trenton, New Jersey, armed with a handgun, a shotgun, and bullet-proof body armor.

(10) On or about September 8, 2003, WILLIAM SOSA, a/k/a “King Homicide,” JOSEPH WALLENBERG, a/k/a “Smiley,” and another Latin King known to the grand jury, entered the home of a male known to the grand jury, for the purpose of murdering him.

(11) On or about November 21, 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” gave two firearms to two Latin Kings, one known and the other unknown to the grand jury, for the purpose of shooting and killing a person who was perceived to be a threat to LEYDA REY-GONZALEZ, a/k/a “Queen Heart,” a/k/a “China.”

(12) On or about November 21, 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered the murder of a person unknown to the grand jury, in response to a perceived threat of violence against LEYDA REY-GONZALEZ, a/k/a “Queen Heart,” a/k/a “China.”

(13) On or about November 21, 2003, at the behest of WILLIAM SOSA, a/k/a “King Homicide,” two Latin Kings, one known and the other unknown to the grand jury, shot

and attempted to kill the person who was perceived to be a threat to LEYDA REY-GONZALEZ, a/k/a “Queen Heart,” a/k/a “China,” near the corner of Luzerne and Fairhill Streets, in Philadelphia.

(14) In or about December 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” and others known to the grand jury as LK-1 and LK-2, agreed to travel to New Jersey to rob a heroin supplier known to the grand jury as J.R., of approximately \$225,000 in cash and approximately five kilograms of heroin.

(15) In or about December 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide” suggested to LK-1 and LK-2 that they murder J.R. in the course of the robbery they planned, a suggestion LK-1 and LK-2 rebuffed.

(16) In or about December 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” issued an order that all ALKQN members in Vineland and Millville, New Jersey must report to the Philadelphia Lion Tribe, must attend meetings in Philadelphia, and must pay dues to the Philadelphia Lion Tribe.

(17) In or about December 2003, in New Jersey, ALKQN members in Vineland and Millville, New Jersey who had become associated with the Philadelphia Lion Tribe received an order issued by a person known to the grand jury as “King Malic,” the “Inca” of the New Jersey Lion Tribe, forbidding them to report to the Philadelphia Lion Tribe, to attend its meetings, or to pay its dues.

(18) On or about December 22, 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered the kidnaping of a Latin King known to the grand jury as LK-3, and a Latin Queen known to the grand jury as LQ-1, from New Jersey to Philadelphia, for the purpose of beating LK-3 and LQ-1, for their failure to report to the Philadelphia Lion Tribe.

(19) On or about December 22, 2003, WILLIAM SOSA, a/k/a “King Homicide,” ALEX MELENDEZ, a/k/a “King A.M.,” ELVIS ORTIZ, a/k/a “King Elvis,” RAY MELENDEZ, a/k/a “King Silence,” ROBERTO ROSADO, a/k/a “King Fester,” and ROCELEEN RESTO, a/k/a “Queen Legend,” kidnaped, and caused the kidnaping of LK-3 and LQ-1 from the Vineland, New Jersey area, to Philadelphia, to confine them against their will, and to beat and severely injure LK-3 and LQ-1.

(20) On or about December 22, 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ALEX MELENDEZ, a/k/a “King A.M.,” ELVIS ORTIZ, a/k/a “King Elvis,” RAY MELENDEZ, a/k/a “King Silence,” ROBERTO ROSADO, a/k/a “King Fester,” and ROCELEEN RESTO, a/k/a “Queen Legend,” confined against his will, beat and severely injured LK-3, and confined LQ-1 against her will.

(21) On or about December 22, 2003, a person known to the grand jury as LK-4 called WILLIAM SOSA, a/k/a “King Homicide,” and warned SOSA against causing any harm to LK-3 and LQ-1.

(22) On or about December 22, 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered that LK-4 be kidnaped from Vineland, New Jersey, and brought to Philadelphia, to be beaten and killed.

(23) On or about December 23, 2003, AARON MARTINEZ, a/k/a “King Life,” ALEX MELENDEZ, a/k/a “King A.M.,” and ROBERTO ROSADO, a/k/a “King Fester,” kidnaped LK-4 from his home in Vineland, New Jersey, threatened LK-4 with death, and took him by car, at gunpoint, to Philadelphia.

(24) On or about December 23, 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” AARON MARTINEZ, a/k/a “King Life,” ALEX MELENDEZ, a/k/a “King

A.M.,” ELVIS ORTIZ, a/k/a “King Elvis,” and ROBERTO ROSADO, a/k/a “King Fester,” confined LK-4 against his will, terrorized LK-4, severely beat LK-4, struck LK-4 with a chair and with a dangerous weapon, that is, a firearm, causing severe bodily injury to LK-4.

(25) On or about December 23, 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered that AARON MARTINEZ, a/k/a “King Life,” ALEX MELENDEZ, a/k/a “King A.M.,” and ROBERTO ROSADO, a/k/a “King Fester,” find and retrieve a machete, to cut off the hands of LK-4, and that ELVIS ORTIZ, a/k/a “King Elvis,” guard LK-4 while a machete was located.

(26) On or about December 24, 2003, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered the murder of LK-4, after LK-4 escaped from confinement by ELVIS ORTIZ, a/k/a “King Elvis.”

(27) On or about January 9, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” issued a “Terminate on Sight” (T.O.S.) order to murder LK-4.

(28) On or about March 16, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” issued an order to travel to the Vineland, New Jersey area, to murder the Vineland area Latin Kings, and their New Jersey supervisors, three of whom are known to the grand jury as “King Malic,” “King Archangel,” and “King Wise.”

(29) On or about March 16, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered Latin Kings from Allentown and Bethlehem, Pennsylvania to serve as reinforcement soldiers in the trip to the Vineland, New Jersey area, to murder the Vineland area Latin Kings.

(30) On or about March 17, 2004, in Philadelphia, JONATHAN SANTANA, a/k/a “King Terror,” ordered the use of firearms for the Philadelphia Lion Tribe’s attack upon the Vineland, New Jersey area Latin Kings.

(31) On or about March 17, 2004, WILLIAM SOSA, a/k/a “King Homicide,” JONATHAN SANTANA, a/k/a “King Terror,” ELVIS ORTIZ, a/k/a “King Elvis,” RAY MELENDEZ, a/k/a “King Silence,” ANGEL SERRANO, a/k/a “King Pleasure,” and REYES SANCHEZ, a/k/a “King Rey,” and other Latin Kings known and unknown to the grand jury, traveled to Vineland, New Jersey, armed with firearms, ammunition, and body armor, to attack and murder persons known to the grand jury as New Jersey Latin Kings.

(32) On or about March 18, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered the kidnaping of a Latin Queen known to the grand jury as LQ-2, from New Jersey to Philadelphia, for the purpose of severely beating LQ-2.

(33) From or about March 18, 2004, to or about April 5, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” JONATHAN SANTANA, a/k/a “King Terror,” AARON MARTINEZ, a/k/a “King Life,” ANGEL SERRANO, a/k/a “King Pleasure,” and ROCELEEN RESTO, a/k/a “Queen Legend,” and other Latin Kings and Latin Queens known and unknown to the grand jury, kidnaped, confined against her will, terrorized and severely beat LQ-2, causing severe bodily injury to LQ-2.

(34) In or about early April, 2004, in Philadelphia, ANGEL SERRANO, a/k/a “King Pleasure,” raped LQ-2, while LQ-2 was confined against her will.

(35) In or about May 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” issued “Terminate On Sight” orders to murder three New Jersey Latin Kings known to the grand jury as “King Malic,” “King Archangel,” and “King Wise.”

(36) In or about early June 2004, WILLIAM SOSA, a/k/a “King Homicide,” issued a “Terminate On Sight” order to murder a Latin King known to the grand jury as LK-5.

(37) In or about early June 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” EDWIN IRIZARRY, a/k/a “King Penguin,” and others known and unknown to the grand jury, confronted, shot at with a firearm, and attempted to murder a Latin King known to the grand jury as LK-5.

(38) On or about June 9, 2004, in Philadelphia, RAY MELENDEZ, a/k/a “King Silence,” possessed in the basement of his home, a firearm, that is, a shotgun.

(39) On or about early August, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered, and caused, the beating of a Latin King known to the grand jury as LK-1, and threatened LK-1 with death.

(40) On or about August 19, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” and a co-conspirator beat up and bodily injured a man who refused to join the Philadelphia Lion Tribe of the ALKQN.

(41) On or about October 1, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered a co-conspirator to interrogate a man in a North Philadelphia bar who was claiming to be a Latin King.

(42) On or about October 1, 2004, in Philadelphia, a co-conspirator interrogated a man, F.G., in a North Philadelphia bar, as to whether F.G. was a bona fide Latin King, determined that F.G. was not a Latin King, and reported his findings to WILLIAM SOSA, a/k/a “King Homicide.”

(43) On or about October 1, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered EDWIN IRIZARRY, a/k/a “King Penguin,” ANGEL AVILES, a/k/a “Len Vando,” a/k/a “King Cano,” and a co-conspirator to murder F.G.

(44) On or about October 1, 2004, in or near the 100 block of West Lippincott Street, in Philadelphia, EDWIN IRIZARRY, a/k/a “King Penguin,” ANGEL AVILES, a/k/a “Len Vando,” a/k/a “King Cano,” and a co-conspirator murdered and aided and abetted the murder of F.G., by shooting F.G. in the back of the head multiple times.

(45) On or about October 20, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered that a Latin Queen, known to the grand jury as LQ-3, be expelled from the ALKQN, and that all Latin Kings tattoos be burned off of her body.

(46) On or about October 20, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” and REYES SANCHEZ, a/k/a “King Rey,” attempted to find and abduct a Latin Queen, known to the grand jury as LQ-3, for the purpose of burning her Latin Kings tattoos off of her body.

(47) On or about October 24, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” and JONATHAN SANTANA, a/k/a “King Terror,” issued a “Terminate On Sight” order to murder a Latin King known to the grand jury as LK-2

(48) On or about October 24, 2004, in Philadelphia, ANGEL AVILES, a/k/a “Len Vando,” a/k/a “King Cano,” attempted to find and murder LK-2, in response to the T.O.S. order issued by WILLIAM SOSA, a/k/a “King Homicide.”

(49) On or about October 29, 2004, in Philadelphia, in response to a confrontation between the Philadelphia Lion Tribe and members of another gang, a co-conspirator possessed a firearm, that is, a loaded .357 handgun.

(50) On or about November 6, 2004, in Philadelphia, JONATHAN SANTANA, a/k/a “King Terror,” and EDWIN IRIZARRY, a/k/a “King Penguin,” met with a person known to the grand jury as LK-1, and discussed the possession and use of firearms.

(51) On or about November 10, 2004, in Chicago, and elsewhere, a co-conspirator and FNU LNU, a/k/a “King Savage,” ordered that JOSEPH WALLENBERG, a/k/a “King Smiley,” receive a five-minute beating for failing to properly supervise and collect dues from the Philadelphia Lion Tribe.

(52) On or about November 10, 2004, in Chicago, and elsewhere, JOSEPH WALLENBERG, a/k/a “King Smiley,” announced his intention to remove WILLIAM SOSA, a/k/a “King Homicide,” from power as “Inca” of the Pennsylvania Latin Kings and his supervision of the Philadelphia Lion Tribe.

(53) On or about November 10, 2004, in Philadelphia, WILLIAM SOSA, a/k/a “King Homicide,” ordered that the murder of a person known to the grand jury as LK-5 be carried out in Graterford Prison, in Pennsylvania.

(54) On or about November 12, 2004, in Philadelphia, EDWIN IRIZARRY, a/k/a “King Penguin,” met with a person known to the grand jury as LK-1.

(55) On or about November 27, 2004, in Philadelphia, JONATHAN SANTANA, a/k/a “King Terror,” LEYDA REY-GONZALEZ, a/k/a “Queen Heart,” a/k/a “China,” OSCAR BERMUDEZ, a/k/a “King Fat Joe,” and REYES SANCHEZ, a/k/a “King Rey,” met with each other and with others known and unknown to the grand jury, and discussed ALKQN business.

(56) On or about November 27, 2004, in Philadelphia, LEYDA REY-GONZALEZ, a/k/a “Queen Heart,” a/k/a “China,” requested that JONATHAN SANTANA, a/k/a

“King Terror,” in the presence of OSCAR BERMUDEZ, a/k/a “King Fat Joe,” and REYES SANCHEZ, a/k/a “King Rey,” and others, supply her with eight Latin Kings, four of whom would be “fully strapped,” that is, armed with firearms, to assist in the kidnaping of eight Latin Queens, who were ordered kidnaped by WILLIAM SOSA, a/k/a “King Homicide.”

(57) On or about November 28, 2004, in Philadelphia, JONATHAN SANTANA, a/k/a “King Terror,” LEYDA REY-GONZALEZ, a/k/a “Queen Heart,” a/k/a “China,” and others known and unknown to the grand jury, attended and presided over the violation hearing of a Latin King and a Latin Queen who were members of the Philadelphia Lion Tribe.

(58) On or about November 28, 2004, in Philadelphia, a Philadelphia Lion Tribe meeting was convened, which meeting was attended by JONATHAN SANTANA, a/k/a “King Terror,” OSCAR BERMUDEZ, a/k/a “King Fat Joe,” LEYDA REY-GONZALEZ, a/k/a “Queen Heart,” a/k/a “China,” and many other Latin Kings and Latin Queens known and unknown to the grand jury.

(59) On or about December 2, 2004, in Philadelphia, a co-conspirator met with a person known to the grand jury as LK-1.

(60) On or about December 17, 2004, in Chicago and elsewhere, a co-conspirator expressed his intention to travel to Philadelphia for the purpose of murdering WILLIAM SOSA, a/k/a “King Homicide.”

(61) On or about December 21, 2004, a co-conspirator, FNU LNU, a/k/a “King Savage,” and JOSEPH WALLENBERG, a/k/a “King Smiley,” invited several persons known to the grand jury to travel from Philadelphia to Chicago, to meet with them regarding the removal from power of WILLIAM SOSA, a/k/a “King Homicide.”

(62) On or about December 27, 2004, in or about Chicago, Illinois, and elsewhere, JONATHAN SANTANA, a/k/a “King Terror,” EDWIN IRIZARRY, a/k/a “King Penguin,” a co-conspirator, JOSEPH WALLENBERG, a/k/a “King Smiley,” and REYES SANCHEZ, a/k/a “King Rey,” met with each other, and agreed to the trial, beating, ouster, and murder of WILLIAM SOSA, a/k/a “King Homicide.”

(63) On or about December 29, 2004, JONATHAN SANTANA, a/k/a “King Terror,” EDWIN IRIZARRY, a/k/a “King Penguin,” and REYES SANCHEZ, a/k/a “King Rey,” returned to Philadelphia from Chicago.

(64) On or about December 30, 2004, in Philadelphia and elsewhere, JONATHAN SANTANA, a/k/a “King Terror,” EDWIN IRIZARRY, a/k/a “King Penguin,” a co-conspirator, JOSEPH WALLENBERG, a/k/a “King Smiley,” and REYES SANCHEZ, a/k/a “King Rey,” agreed to murder WILLIAM SOSA, a/k/a “King Homicide,” and to appoint REYES SANCHEZ, a/k/a “King Rey,” as the new “Inca” of the Pennsylvania Latin Kings.

(65) On or about January 4, 2005, REYES SANCHEZ, a/k/a “King Rey,” sold a bullet-proof vest, in which two bullets were lodged, to a person known to the grand jury as LK-1, in exchange for \$400.00

(66) On or about January 5, 2005, a co-conspirator instructed REYES SANCHEZ, a/k/a “King Rey,” by telephone, to forward all Philadelphia Lion Tribe dues to Chicago, in the name of the co-conspirator.

(67) In or about December 2004 and January 2005, a co-conspirator established himself as the “Inca” of the Pennsylvania office of the ALKQN, with direct oversight over the Philadelphia Lion Tribe, named REYES SANCHEZ, a/k/a “King Rey,” as his proxy, and

suspended WILLIAM SOSA, a/k/a “King Homicide,” from his supervisory duties.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO

CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. In or about the Summer of 2002, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing his position in the enterprise, defendant

WILLIAM SOSA,
a/k/a “King Homicide,”

conspired and agreed with others known and unknown to the grand jury, to commit the knowing and intentional murder of a person known to the grand jury by the alias of “Snoopy,” in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT THREE

CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. On or about November 21, 2003, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing his position in the enterprise, defendant

WILLIAM SOSA,
a/k/a “King Homicide,”

conspired and agreed with others known and unknown to the grand jury, to commit the knowing and intentional murder of a person whose identity is unknown to the grand jury, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT FOUR

**USING AND CARRYING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 21, 2003, in Philadelphia, in the Eastern District of Philadelphia, and elsewhere, defendant

**WILLIAM SOSA,
a/k/a “King Homicide,”**

knowingly used and carried, and aided and abetted the use and carrying of, firearms, that is, handguns, during and in relation to a crime of violence for which he may be prosecuted in a Court of the United States, that is, conspiracy to commit murder in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii), and 2.

COUNT FIVE

CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. On or about September 8, 2003, in Philadelphia, in the Eastern District of Pennsylvania, in Trenton, New Jersey, and elsewhere, for the purpose of maintaining and increasing their positions in the enterprise, defendants

WILLIAM SOSA,
a/k/a “King Homicide,” and
JOSEPH WALLENBERG,
a/k/a “Smiley,”

conspired and agreed with each other, and with others known and unknown to the grand jury, to commit the knowing and intentional murder of a person whose identity is unknown to the grand jury, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT SIX

**USING AND CARRYING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 8, 2003, in Philadelphia, in the Eastern District of Philadelphia, in Trenton, New Jersey, and elsewhere, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,” and
JOSEPH WALLENBERG,
a/k/a “Smiley,”**

knowingly used and carried, and aided and abetted the use and carrying of, firearms, that is, a handgun and a shotgun, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit murder in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii), and 2.

COUNT SEVEN

**CONSPIRACY TO DISTRIBUTE HEROIN
WITHIN 1000 FEET OF A PUBLIC ELEMENTARY SCHOOL
21 U.S.C. §§ 846 and 860**

THE GRAND JURY FURTHER CHARGES THAT:

From in or about August 2003 to in or about March 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
ALEX MELENDEZ,
a/k/a “King A.M.,”
ELVIS ORTIZ,
a/k/a “King Elvis,”
RAY MELENDEZ,
a/k/a “King Silence,” and
OSCAR BERMUDEZ,
a/k/a “King Fat Joe,”**

conspired and agreed with each other, and with others known and unknown to the grand jury, to knowingly and intentionally distribute 1000 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); and to knowingly and intentionally distribute and to possess with intent to distribute these controlled substances within 1000 feet of the real property comprising the Isaac A. Sheppard Elementary School, a public school, located at 120 West Cambria Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 860.

MANNER AND MEANS

It was part of the conspiracy that:

1. A person known to the grand jury as LK-1 sold and distributed heroin from the area of Hope and Cambria Streets, in Philadelphia, Pennsylvania;
2. Defendant OSCAR BERMUDEZ, a/k/a “King Fat Joe,” sold and distributed heroin from the area of Kip and Tioga Streets, in Philadelphia, Pennsylvania;
3. Defendant OSCAR BERMUDEZ, a/k/a “King Fat Joe,” sold and distributed heroin from the area of Marshall and Pike Streets, in Philadelphia, Pennsylvania;
4. Defendant WILLIAM SOSA, a/k/a “King Homicide,” established rules for selling heroin, including a ban on the wearing of all ALKQN clothing, colors, and paraphernalia, and a ban on drug dealers representing themselves as Latin Kings while dealing drugs on the street;
5. Defendant WILLIAM SOSA, a/k/a “King Homicide,” directed one-tenth of all illegal drug trafficking revenues to be submitted as revenue for the Philadelphia Lion Tribe; and
6. Defendants ALEX MELENDEZ, a/k/a “King A.M.,” ELVIS ORTIZ, a/k/a “King Elvis,” and RAY MELENDEZ, a/k/a “King Silence,” threatened, intimidated, and physically beat drug customers who did not pay their drug debts to the defendants and to other Latin King drug dealers.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the following overt acts, among others, were performed by at least one member of the conspiracy, in Philadelphia, in the Eastern District of Pennsylvania:

1. On or about January 14, 2003, in Philadelphia, a person known to the grand jury as LK-1 sold and distributed to an undercover police officer four bags of heroin, weighing approximately 0.12 grams, in exchange for \$40.00, at or near the corner of Hope and Cambria Streets.

2. On or about June 29, 2003, in Philadelphia, persons known to the grand jury as LK-1 and C.T. sold and distributed to an undercover police officer, and possessed with intent to distribute a small quantity of heroin, at or near the corner of Hope and Cambria Streets.

3. On or about June 29, 2003, in Philadelphia, persons known to the grand jury as LK-1 and C.T. sold and distributed to an undercover police officer, and LK-1 supervised the distribution of, a second small quantity of heroin, at or near the corner of Hope and Cambria Streets.

4. On or about October 18, 2003, in Philadelphia, a person known to the grand jury as LK-1 sold and distributed to an undercover police officer ten bags of heroin, each bag containing a small quantity of heroin, at or near the corner of Hope and Cambria Streets.

5. On or about October 24, 2003, in Philadelphia, a person known to the grand jury as LK-1 sold and distributed to an undercover police officer four bags of heroin, each bag containing a small quantity of heroin, in exchange for \$40.00, at or near the corner of Hope and Cambria Streets.

6. On or about October 24, 2003, in Philadelphia, a person known to the grand jury as LK-1 sold and distributed to an undercover police officer seven bags of heroin, each bag containing a small quantity of heroin, in exchange for \$120.00, at or near the corner of Hope and Cambria Streets.

All in violation of Title 21, United States Code, Section 846.

COUNT EIGHT

CONSPIRACY TO COMMIT ROBBERY AND THEREBY AFFECT COMMERCE
18 U.S.C. § 1951(a), (b)(1)

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this count, defendant WILLIAM SOSA, a/k/a “King Homicide,” and a person known to the grand jury as “J.R.,” were engaged in the sale, distribution and trafficking of illegal controlled substances, that is, heroin, in Philadelphia, Pennsylvania and in the District of New Jersey, activities which affected interstate commerce.

2. In or about December 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

WILLIAM SOSA,
a/k/a “King Homicide,”

conspired and agreed with others known to the grand jury to commit robbery, and thereby obstruct, delay and affect commerce and the movement of articles and commodities in commerce, in that, the defendant planned to obtain property, that is, money and heroin, from “J.R.,” against his will, by means of actual and threatened force, violence and fear of injury, immediate and future, to his person and property, in violation of Title 18, United States Code, Section 1951(a), (b)(1) and (b)(3).

MANNER AND MEANS

The manner and means of this conspiracy include the manner and means set forth in Count Seven of this indictment, which are incorporated by reference here. In addition, it was also part of the conspiracy that:

3. J.R. was a supplier of heroin to defendant WILLIAM SOSA, a/k/a “King Homicide,” and to the enterprise, directly supplying a person known to the grand jury as LK-1.

4. J.R. resided in the District of New Jersey, and kept in his residence large amounts of U.S. currency and heroin.

OVERT ACTS

In furtherance of this conspiracy and to accomplish its object, the following overt acts, among others, were committed by at least one member of the conspiracy in the Eastern District of Pennsylvania and elsewhere:

1. In or about December 2003, defendant WILLIAM SOSA, a/k/a “King Homicide,” and others known to the grand jury as LK-1 and LK-2 discussed that J.R. possessed in his residence approximately \$225,000 in cash and approximately five kilograms of heroin.

2. In or about December 2003, defendant WILLIAM SOSA, a/k/a “King Homicide,” and others known to the grand jury planned and agreed to unlawfully enter J.R.’s residence, and to rob J.R. of his heroin and approximately \$225,000 in illegal drug proceeds.

3. In or about December 2003, defendant WILLIAM SOSA, a/k/a “King Homicide,” urged and solicited LK-1 and LK-2 to murder J.R. in the course of the robbery.

4. In or about December 2003, defendant WILLIAM SOSA, a/k/a “King Homicide,” agreed to the pleas of LK-1 and LK-2 to not murder J.R.

5. In or about December 2003, J.R. fled his residence, thus thwarting the plan of defendant WILLIAM SOSA, a/k/a “King Homicide,” and others to rob J.R.

All in violation of Title 18, United States Code, Section 1951(a), (b)(1) and (b)(3).

COUNT NINE

KIDNAPING IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. On or about December 22, 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing their positions in the enterprise, defendants

WILLIAM SOSA,
a/k/a “King Homicide,”
ALEX MELENDEZ,
a/k/a “King A.M.,”
ELVIS ORTIZ,
a/k/a “King Elvis,”
RAY MELENDEZ,
a/k/a “King Silence,”
ROBERTO ROSADO,
a/k/a “King Fester,” and
ROCELEEN RESTO,
a/k/a “Queen Legend,”

knowingly and intentionally kidnaped, and aided and abetted the kidnaping of, persons known to the grand jury as LK-3 and LQ-1, by unlawfully removing LK-3 and LQ-1 a substantial distance

and confining them for a substantial time, with intent to inflict bodily injury upon LK-3 and LQ-1, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2901 and 306.

All in violation of Title 18, United States Code, Section 1959(a)(1) and 2.

COUNT TEN

**CONSPIRACY TO COMMIT KIDNAPING IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. On or about December 22, 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing their positions in the enterprise, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
ALEX MELENDEZ,
a/k/a “King A.M.,”
ELVIS ORTIZ,
a/k/a “King Elvis,”
RAY MELENDEZ,
a/k/a “King Silence,”
ROBERTO ROSADO,
a/k/a “King Fester,” and
ROCELEEN RESTO,
a/k/a “Queen Legend,”**

conspired and agreed with each other, and with others known and unknown to the grand jury, to kidnap persons known to the grand jury as LK-3 and LQ-1, by unlawfully removing LK-3 and

LQ-1 a substantial distance and confining them for a substantial time, with intent to inflict bodily injury upon LK-3 and LQ-1, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2901.

All in violation of Title 18, United States Code, Sections 1959(a)(5).

COUNT ELEVEN

KIDNAPING IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. On or about December 23, 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing their positions in the enterprise, defendants

WILLIAM SOSA,
a/k/a “King Homicide,”
AARON MARTINEZ,
a/k/a “King Life,”
ALEX MELENDEZ,
a/k/a “King A.M.,”
ELVIS ORTIZ,
a/k/a “King Elvis,” and
ROBERTO ROSADO,
a/k/a “King Fester,”

knowingly and intentionally kidnaped, and aided and abetted the kidnaping of, a person known to the grand jury as LK-4, by unlawfully removing LK-4 a substantial distance and confining him for a substantial time, with intent to inflict bodily injury upon LK-4, in violation of the laws of

the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2901 and 306.

All in violation of Title 18, United States Code, Section 1959(a)(1) and 2.

COUNT TWELVE

**CONSPIRACY TO MAIM IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(6)**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. From on or about December 22, 2003 to on or about December 24, 2003, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing their positions in the enterprise, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
AARON MARTINEZ,
a/k/a “King Life,”
ALEX MELENDEZ,
a/k/a “King A.M.,”
ELVIS ORTIZ,
a/k/a “King Elvis,” and
ROBERTO ROSADO,
a/k/a “King Fester,”**

conspired and agreed with each other, and with others known and unknown to the grand jury, to maim a person known to the grand jury as LK-4, by cutting off his hands, in violation of the laws

of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2702(a)(1) and 903.

All in violation of Title 18, United States Code, Sections 1959(a)(6).

COUNT THIRTEEN

CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. From on or about December 22, 2003 to in or about January 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing their positions in the enterprise, defendants

WILLIAM SOSA,
a/k/a “King Homicide,”
AARON MARTINEZ,
a/k/a “King Life,”
ALEX MELENDEZ,
a/k/a “King A.M.,”
ELVIS ORTIZ,
a/k/a “King Elvis,” and
ROBERTO ROSADO,
a/k/a “King Fester,”

conspired and agreed with each other, and with others known and unknown to the grand jury, to commit the knowing and intentional murder of a person known to the grand jury as LK-4, in

violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Sections 1959(a)(5).

COUNT FOURTEEN

**USING AND CARRYING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 23, 2003, in Philadelphia, in the Eastern District of Philadelphia, and elsewhere, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
AARON MARTINEZ,
a/k/a “King Life,”
ALEX MELENDEZ,
a/k/a “King A.M.,”
ELVIS ORTIZ,
a/k/a “King Elvis,” and
ROBERTO ROSADO,
a/k/a “King Fester,”**

knowingly used and carried, and aided and abetted the use and carrying of, firearms, that is, handguns, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit murder in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii), and 2.

COUNT FIFTEEN

CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. From on or about March 16, 2004 to in or about May 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing their positions in the enterprise, defendants

WILLIAM SOSA,
a/k/a “King Homicide,”
JONATHAN SANTANA,
a/k/a “King Terror,”
ELVIS ORTIZ,
a/k/a “King Elvis,”
RAY MELENDEZ,
a/k/a “King Silence,”
ANGEL SERRANO,
a/k/a “King Pleasure,” and
REYES SANCHEZ,
a/k/a “King Rey,”

conspired and agreed with each other, and with others known and unknown to the grand jury, to commit the knowing and intentional murder of multiple individuals known and unknown to the

grand jury, including individuals known to the grand jury as “King Malic,” “King Archangel,” and “King Wise,” in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT SIXTEEN

**USING AND CARRYING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2004, in Philadelphia, in the Eastern District of Philadelphia, and elsewhere, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
JONATHAN SANTANA,
a/k/a “King Terror,”
ELVIS ORTIZ,
a/k/a “King Elvis,”
RAY MELENDEZ,
a/k/a “King Silence,”
ANGEL SERRANO,
a/k/a “King Pleasure,” and
REYES SANCHEZ,
a/k/a “King Rey,”**

knowingly used and carried, and aided and abetted the use and carrying of, firearms, that is, handguns, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit murder in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii), and 2.

COUNT SEVENTEEN

**KIDNAPING IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. From on or about March 18, 2004 to on or about April 5, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing their positions in the enterprise, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
JONATHAN SANTANA,
a/k/a “King Terror,”
AARON MARTINEZ,
a/k/a “King Life,”
ANGEL SERRANO,
a/k/a “King Pleasure,” and
ROCELEEN RESTO,
a/k/a “Queen Legend,”**

together, and with others known and unknown to the grand jury, knowingly and unlawfully kidnaped a person known to the grand jury as LQ-2, and aided and abetted the kidnaping of LQ-2, by removing LQ-2 a substantial distance, and confining LQ-2 for a substantial period of time,

with intent to facilitate the commission of another felony, that is, aggravated assault and rape, and to inflict bodily injury upon and terrorize LQ-2, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2901, 2702(a)(1), and 306.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT EIGHTEEN

CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. From in or about June 2004, to in or about December 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing their positions in the enterprise, defendants

WILLIAM SOSA,
a/k/a “King Homicide,” and
EDWIN IRIZARRY,
a/k/a “King Penguin,”

conspired and agreed with each other, and with others known and unknown to the grand jury, to commit the knowing and intentional murder of a person known to the grand jury as LK-5, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT NINETEEN

**ATTEMPTED MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. In or about June 2004, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing their positions in the enterprise, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,” and
EDWIN IRIZARRY,
a/k/a “King Penguin,”**

attempted to commit the knowing and intentional murder, and aided and abetted the attempted murder, of a person known to the grand jury as LK-5, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502(a) and 306.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TWENTY

**USING AND CARRYING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

In or about June 2004, in Philadelphia, in the Eastern District of Philadelphia, and elsewhere, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,” and
EDWIN IRIZARRY,
a/k/a “King Penguin,”**

knowingly used and carried, and aided and abetted the use and carrying of, firearms, that is, handguns, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit murder in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii), and 2.

COUNT TWENTY-ONE

**CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. On or about October 1, 2004, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing their positions in the enterprise, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
EDWIN IRIZARRY,
a/k/a “King Penguin,”
ANGEL AVILES,
a/k/a “Len Vando,”
a/k/a “King Cano,” and
CLEMENT GARCIA,
a/k/a “King K.R.,”**

conspired and agreed with each other, and with others known and unknown to the grand jury, to commit the knowing and intentional murder of F.G., a/k/a “Toto,” in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated

Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TWENTY-TWO

**USING AND CARRYING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 1, 2004, in Philadelphia, in the Eastern District of Philadelphia, and elsewhere, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
EDWIN IRIZARRY,
a/k/a “King Penguin,”
ANGEL AVILES,
a/k/a “Len Vando,”
a/k/a “King Cano,” and
CLEMENT GARCIA,
a/k/a “King K.R.,”**

knowingly used and carried, and aided and abetted the use and carrying of, firearms, that is, handguns, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to commit murder in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii), and 2.

COUNT TWENTY-THREE

**CONSPIRACY TO MAIM IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(6)**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. On or about October 20, 2004, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing their positions in the enterprise, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,” and
REYES SANCHEZ,
a/k/a “King Rey,”**

conspired and agreed with each other, and with others known and unknown to the grand jury, to maim a person known to the grand jury as LQ-3, by removing a Latin Kings tattoo from her skin by burning, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2702(a)(1) and 903.

All in violation of Title 18, United States Code, Section 1959(a)(6).

COUNT TWENTY-FOUR

CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. From on or about October 24, 2004, to in or about December 2004, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing their positions in the enterprise, defendants

WILLIAM SOSA,
a/k/a “King Homicide,”
JONATHAN SANTANA,
a/k/a “King Terror,” and
ANGEL AVILES,
a/k/a “Len Vando,”
a/k/a “King Cano,”

conspired and agreed with each other, and with others known and unknown to the grand jury, to commit the knowing and intentional murder of a person known to the grand jury as LK-2, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania

Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TWENTY-FIVE

**CONSPIRACY TO COMMIT KIDNAPING IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)**

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. On or about November 27, 2004, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing their positions in the enterprise, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
JONATHAN SANTANA,
a/k/a “King Terror,”
LEYDA REY-GONZALEZ,
a/k/a “Queen Heart,”
a/k/a “China,”
OSCAR BERMUDEZ,
a/k/a “King Fat Joe,” and
REYES SANCHEZ,
a/k/a “King Rey,”**

conspired and agreed with each other, and with others known and unknown to the grand jury, to commit the knowing and intentional kidnaping of approximately eight persons known and

unknown to the grand jury, including Latin Queens known to the grand jury as “Envy,” “Maggie,” “Baby Girl,” and “Kitty Kat,” in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2901 .

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TWENTY-SIX

CONSPIRACY TO COMMIT MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Philadelphia Lion Tribe, as described more particularly in paragraphs 2 through 15 of Count One, which paragraphs are realleged here, constitutes an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association-in-fact of individuals, which is engaged in, and the activities of which affect, interstate commerce.

2. The Philadelphia Lion Tribe was engaged in racketeering activity, including acts and threats involving murder, attempted murder, kidnaping, robbery, and the dealing in controlled substances, that is, the conspiracy to distribute and possess with intent to distribute heroin.

3. From on or about October 24, 2004, to on or about January 3, 2005, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing their positions in the enterprise, defendants

JONATHAN SANTANA,
a/k/a “King Terror,”
EDWIN IRIZARRY,
a/k/a/ “King Penguin,”
MICHAEL J. GARCIA, Jr.,
a/k/a “King Tiger,”
JOSEPH WALLENBERG,
a/k/a/ “King Smiley,” and
REYES SANCHEZ,
a/k/a “King Rey,”

conspired and agreed with each other, and with others known and unknown to the grand jury, to commit the knowing and intentional murder of William Sosa, a/k/a “King Homicide,” in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania

Consolidated Statutes Annotated, Sections 903 and 2502(a).

All in violation of Title 18, United States Code, Section 1959(a)(5).

NOTICE OF FORFEITURE

(RACKETEERING FORFEITURE)

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1962(d) set forth in Count One of this indictment, which is realleged here, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
JONATHAN SANTANA,
a/k/a “King Terror,”
AARON MARTINEZ,
a/k/a “King Life,”
EDWIN IRIZARRY,
a/k/a “King Penguin,”
JOSEPH WALLENBERG,
a/k/a “King Smiley,”
ALEX MELENDEZ,
a/k/a “King A.M.,”
ANGEL AVILES,
a/k/a “King Cano,”
ELVIS ORTIZ,
a/k/a “King Elvis,”
RAY MELENDEZ,
a/k/a “King Silence,”
ROBERTO ROSADO,
a/k/a “King Fester,”
ANGEL SERRANO,
a/k/a “King Pleasure,”
LEYDA REY-GONZALEZ,
a/k/a “Queen Heart,”
a/k/a “China,”
OSCAR BERMUDEZ,
a/k/a “King Fat Joe,”
ROCELEEN RESTO,
a/k/a “Queen Legend,” and
REYES SANCHEZ,
a/k/a “King Rey”**

(a) have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

(b) have interests in, securities of, claims against, and property and contractual rights affording a source of influence over, the enterprise named and described in the indictment, which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); and

(c) have property constituting, and derived from, proceeds which the defendants obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963.

2. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Sections 1963(a)(1), (a)(2), and (a)(3), include, but are not limited to, an exact amount unknown to the grand jury, but in excess of \$3,000,000.

3. In the event that any property subject to forfeiture pursuant to Title 18, United States Code, Section 1963, or any property traceable to such property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred, sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendants, up to the value of the property subject to forfeiture.

4. The above named defendants are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Sections 1963(a)(1), (2), and (3), and 1963(m).

NOTICE OF FORFEITURE

(NARCOTICS FORFEITURE)

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 21, United States Code, Sections 846 and 841(a)(1) set forth in Count Seven of this indictment, defendants

**WILLIAM SOSA,
a/k/a “King Homicide,”
ALEX MELENDEZ,
a/k/a “King A.M.,”
ELVIS ORTIZ,
a/k/a “King Elvis,”
RAY MELENDEZ,
a/k/a “King Silence,” and
OSCAR BERMUDEZ,
a/k/a “King Fat Joe,”**

shall forfeit to the United States under Title 21, United States Code, Section 853:

(a) any and all real and/or personal property which the defendants used in any manner or part to facilitate the commission of the violations of Title 21, United States Code, as charged in this indictment;

(b) any and all real and/or personal property constituting, or derived from, any proceeds obtained, directly and indirectly, as a result of the violations of Title 21, United States Code, as charged in this indictment, including, but not limited to, the sum of \$3,000,000.

2. If any property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred, sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants, up to the value of the property subject to forfeiture.

3. The above named defendants are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**